

IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

VANESSA BANDRICH,

Defendant.

12 Cr. 934 (RA)

The Hon. Ronnie Abrams

DECLARATION OF
SEAN M. MAHER, ESQ.

I, SEAN M. MAHER, ESQ., an attorney duly licensed to practice in all courts in the State of New York, and the United States District Court for the Southern District of New York, hereby declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I represent Ms. Vanessa Bandrich in the above-captioned proceeding, having been assigned under the Criminal Justice Act. I am familiar with the facts of this case. The following declaration is based upon my review of documents filed with the Court and of the discovery disclosed by the government, as well as conversations and correspondence with the assigned Assistant United States Attorneys.
2. This affirmation is submitted in support of Ms. Bandrich's (a) motion to suppress evidence and (b) motion to join in the motions of her co- defendants.
3. Counsel certifies that all statements in the motion and its accompanying memorandum of law that are not otherwise supported by cited authority are true and correct upon information and belief.

4. The exhibits annexed to these moving papers are copies provided to counsel by the government.

5. For the reasons set forth herein, in the notice of motion, and in the accompanying memorandum of law, it is respectfully submitted that Ms. Bandrich's motions should be granted.

Dated: August 9, 2013
New York, New York

Respectfully submitted,

/S/
SEAN M. MAHER
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